

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In the Matter of the Application of

07-CV-2799 (MGC)(FM)

RAMY LAKAH and MICHEL LAKAH,

DECLARATION OF
GAMIL HALIM

Petitioners,

-against-

for a judgment pursuant to Article 75 of the
C.P.L.R. staying the arbitration commenced by

UBS AG, EXPORTERS INSURANCE
COMPANY, LTD., ARAB BANKING
CORPORATION, NATIONAL BANK OF ABU
DHABI and NATIONAL BANK OF OMAN,

Respondents.

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Gamil Halim, declares:

1. I am a member of the Bar of the Syndicate of Lawyers in Egypt, under number 43491, dated November 11, 1982. I have practiced law in Egypt, continuously, for the past 25 years. Mr. Lakah is my long time client. He has requested that I address certain issues by declaration.

2. First, I am familiar with the visa waiver program. In 2003, the Mubarak regime falsely made accusations against him supposedly for purported back taxes and an Interpol warrant was issued for him. Because of that warrant, he was detained at the airport and forced to leave the United States. This deportation prevents him now from using the visa waiver program to enter the United States, other than by visa. The last time he came to the United States, he was forced to obtain a visa.

Gamil Halim

3. Second, the current Egyptian government has forbidden certain businessmen and politicians from leaving Egypt for a period of six months. Mr. Lakah is one of them. It was the corruption of Egypt's elections that brought about the riots and revolution which ultimately toppled that regime and the demand of Egyptians for new elections. Mr. Lakah was a member of the liberal, secular democratic opposition to Mubarak.

4. Third, our banks are currently short of cash due to our revolution.

5. As Mr. Lakah's counsel, I also know the Egyptian Public Prosecutor has opened a criminal case against UBS in Egypt for corruption, misuse of funds and conspiracy.

6. Martial law has been declared in Egypt due to ongoing riots and criminal conduct. The army has decreed that martial law will be in effect for the next six months.

7. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

8. Executed this 23rd day of February, 2011.

Gamil Halim
GAMIL HALIM